

October 5, 2016

Dear FCC,

Concerning RM-11708 and WT-16-239, it would be a mistake to allow wide band digital modes throughout the CW (lower) parts of the high frequency ham bands. This would increase the noise levels in these band segments as people would be using these for internet connections and for commercial purposes. CW is still used by many of us to contact stations all over the world.

I urge that the FCC part 97 rules reserve approximately the lower 100 KHZ of the 80,40,20, 15, and 10 meter ham bands for the exclusive use by CW and Narrow Band Digital Modes using a maximum of 500HZ bandwidth. Using generally applicable standards the FCC could separate the incompatible modes by Law, not by voluntary band plans.

There should be a separate Wide Band Digital band area above the 100KHZ CW/Data band for all "robot" ACDS, regardless of bandwidth, and wide band digital signals. CW ID should be used for these digital signals. Wide band digital and ACDS "robots" should not be permitted in the 160, 30, 17, and 12 meter bands. These changes should not affect the current voice/image band segments.

The UHF/VHF bands have more room for wider bandwidth modes and they usually don't propagate as far as the HF bands so the interference doesn't travel as far.

Novice and Technician licensees should not be granted a "Free Upgrade" for new data privileges on the high frequency ham bands. The license tests are not that hard and encourage further learning which improves the hobby.

Please mitigate the damage that the proposed rules would do by incorporating the changes that I have suggested.

My call is NE2T (Extra Class) and I have been licensed since 1964.

Respectfully Submitted,

J. Douglas Reid

105 Sheldon Rd.
Ithaca NY, 14850-2501
607-257-6066